

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

HOAU-YAN WANG,

Defendant.

CRIMINAL NO: TDC-24-211

**NOTICE OF FILING SUPPLEMENTAL EXHIBITS TO THE GOVERNMENT'S
MOTION TO EXCLUDE EXPERT TESTMONY**

Consistent with the Court's Case Management Order and the Court's September 17, 2025 Order, the United States of America, through its undersigned attorneys, respectfully submits supplemental exhibits to its Motion to Exclude Expert Testimony (ECF No. 85). *See* ECF No. 20; ECF No. 93. The government is providing exhibit copies of the internet sources and also copies of the scientific articles cited in the government's motion for the Court's reference as follows:

Exhibit Number	Citation	Citation Location
5	"Ernest P. Chiodo" "Physician-Attorney". <i>available at</i> https://www.ernestpchiodo.com/ (last accessed Sept. 18, 2025).	ECF No. 85 at 4
6	Moreira, D., Cardenuto, J.P., Shao, R. <i>et al.</i> SILA: a system for scientific image analysis. <i>Sci Rep</i> 12, 18306 (2022).	ECF No. 85 at 5
7	Bik, E., Casadevall, A. & Fang, F. The prevalence of inappropriate image duplication. <i>Biomed. Res. Publ.</i> 7 (2016).	ECF No. 85 at 5, n. 2
8	Bucci, E. Automatic detection of image manipulations in the biomedical literature. <i>Nat. Cell Death Dis.</i> 9, 400 (2018).	ECF No. 85 at 5, n.2
9	Zhang, X., Sun, Z. H., Karaman, S. & Chang, S.-F. Discovering image manipulation history by pairwise relation and forensics tools. <i>IEEE J. Select. Top. Signal Process.</i> 1012–1023 (2020).	ECF No. 85 at 5, n.2
10	Rossner, M. & Yamada, K. What's in a picture? The temptation of image manipulation. <i>J. Cell Biol.</i> 166, 11–15 (2004).	ECF No. 85 at 5-6, n.2
11	Mazaheri, G., Avila, K. U. & Roy-Chowdhury, A; Learning to identify image manipulations in scientific publications arXiv:2102.01874 (2021).	ECF No. 85 at 6, n.2
12	Mandelli, S. <i>et al.</i> Forensic analysis of synthetically generated western blot images. <i>IEEE Access</i> 10, 59919–59932 (2022).	ECF No. 85 at 6, n.2

13	Forensic Tools. Office of Research Integrity, https://ori.hhs.gov/forensic-tools (last accessed Sept. 18, 2025).	ECF No. 85 at 7, n.3
14	Advanced Forensic Actions. Office of Research Integrity, https://ori.hhs.gov/advanced-forensic-actions#readme1a (last accessed Sept. 18, 2025).	ECF No. 85 at 7, n.3
15	ImageJ – Image Processing and Analysis in Java. https://imagej.net/ij/ (last accessed Sept. 18, 2025).	ECF No. 85 at 7, n.3
16	Case Summaries. Office of Research Integrity, https://ori.hhs.gov/content/case_summary (last accessed Sept. 18, 2025).	ECF No. 85 at 7, n.4
17	Case Summary: Zhang, Liping. Office of Research Integrity, https://ori.hhs.gov/content/case-summary-zhang-liping (also available at https://www.federalregister.gov/documents/2025/03/19/2025-04489/findings-of-research-misconduct) (last accessed Sept. 18, 2025)	ECF No. 85 at 7, n.5
18	Case Summary: Eckert, Richard L. Office of Research Integrity, https://ori.hhs.gov/content/case-summary-eckert-richard-l (also available at https://www.federalregister.gov/documents/2024/08/15/2024-18289/findings-of-research-misconduct) (last accessed Sept. 18, 2025)	ECF No. 85 at 7, n.5
19	Case Summary: Danenberg, Andrew. Office of Research Integrity, https://ori.hhs.gov/content/case-summary-dannenberg-andrew (also available at https://www.federalregister.gov/documents/2023/09/13/2023-19779/findings-of-research-misconduct) (last accessed Sept. 18, 2025)	ECF No. 85 at 7, n.5

Respectfully submitted,

Lorinda I. Laryea
Acting Chief
Fraud Section, Criminal Division
United States Department of Justice

By: /s/
Andrew Tyler
Vasanth Sridharan
Fraud Section, Criminal Division
United States Department of Justice
Attorneys for the Government

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send notice to all counsel of record.

_____/s/_____
Andrew Tyler, Acting Assistant Chief
Fraud Section, Criminal Division
United States Department of Justice